

From: **David J. Strachman** <djs@mtlesq.com>

Date: Mon, Nov 15, 2010 at 10:51 AM

Subject: RE: Ungar v. PLO privilege log

To: "Hill, Brian" <BHill@milchev.com>, "Hibey, Richard" <rhibey@milchev.com>, "Rochon, Mark" <mrochon@milchev.com>, "Sherman, Deming" <dsherma@eapdlaw.com>

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Brian,

1) Are you representing, subject to Rule 11, that there were never any written communications between the PA and the "PIF" regarding the relevant topics except via attorneys?

2) Are you representing, subject to Rule 11, that there were never any written communications between the PA's and/or its attorneys and the attorneys purporting to represent the PIF, in the two years between the initiation of the Ungars' enforcement proceedings against PIF-titled assets and Miller & Chevalier's retention? Because none are listed in the log.

3) Are you prepared to specify exactly what search was undertaken?

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